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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARIA MUNOZ,

Defendant.

CASE NO. 1:20-CR-00123-DAD-BAM

STIPULATION AND PROTECTIVE ORDER
BETWEEN THE UNITED STATES AND
DEFENDANT MARIA MUNOZ

COURT: Hon. Barbara A. McAuliffe

WHEREAS, the discovery in this case contains information relating to the actions of as-yet
unindicted co-conspirator(s) (“Protected Information”); and

WHEREAS, the parties desire to avoid the unauthorized disclosure or dissemination of this
information to anyone not a party to the court proceedings in this matter;

The parties agree that entry of a stipulated protective order is appropriate.

THEREFORE, Defendant Maria Munoz, by and through her counsel of record (“Defense
Counsel”), and the United States of America, by and through Assistant United States Attorney Laura D.
Withers, hereby agree and stipulate as follows:

1. This Court may enter a protective order pursuant to Rule 16(d) of the Federal Rules of
Criminal Procedure, and its general supervisory authority.

2. This Order pertains to all discovery provided to or made available to Defense Counsel as
part of discovery in this case (hereafter, collectively known as “the discovery”).

3. By signing this Stipulation and Protective Order, Defense Counsel and Defendant agree

not to share any documents that contain Protected Information with anyone other than Defendant, Defense Counsel attorneys, designated defense investigators, and support staff.

4. The discovery and information therein may be used only in connection with the litigation of this case and for no other purpose. The discovery is now and will forever remain the property of the United States of America ("Government"). Defense counsel will return the discovery to the Government at the conclusion of the case after the exhaustion of all direct and collateral appeals.

5. Defense Counsel will store the discovery in a secure place and will use reasonable care to ensure that it is not disclosed to third persons in violation of this agreement.

6. Defense Counsel shall be responsible for advising the Defendant, employees, and other members of the defense team, and defense witnesses of the contents of this Stipulation and Order.

7. In the event that Defendant substitutes counsel, undersigned Defense Counsel agrees to withhold discovery from new counsel unless and until substituted counsel agrees also to be bound by this Order.

IT IS SO STIPULATED.

Dated: August 3, 2020

MCGREGOR W. SCOTT
United States Attorney

By: /s/ Laura D. Withers
LAURA D. WITHERS
Assistant United States Attorney

Dated: August 3, 2020

By: /s/ Caroline McCreary
CAROLINE MCCREARY
Attorney for Defendant
MARIA MUNOZ

IT IS SO ORDERED.

Dated: August 4, 2020

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE